

Appendix 1 – Preparations for implementation of the Social Housing Act

Criteria	Implication	Preparations underway
<p><b>More proactive regulation</b></p>	<p>Lewisham will need to be ready for inspection and ensure all standards are complied with. Complete transparency with the Regulator will be required. The Regulator could require a Performance Improvement Plan to be put in place if compliance is not satisfactory.</p> <p>Unlimited fines will be levied at housing associations or councils if they are found to be persistently under-performing.</p>	<p>Preparations for proactive regulation require the council to be ready for each of the below criteria:                      New consumer standards                      New Decent Homes standard                      New TSMs                      New qualifications</p> <p>In ensuring we are prepared for each of these criteria, we will ensure preparedness for more proactive regulation overall.</p> <p>The actions below set out how we are preparing for each specific aspect which contributes to more proactive regulation.</p>
<p><b>New Consumer Standards</b></p>	<p>If RSH orders emergency repairs, Lewisham could be expected to complete repairs which have not been planned and to do so on short notice would have a knock-on impact on the schedule of planned works, and on the HRA budget. It will also have to be borne in mind that our stock is older and more prone to damp and mould and that there is a lack of availability of stock to move / decant households to.</p> <p>RSH can set performance improvement plans ('PIPs' backed up with penalties for landlords who do not deliver). PIPs will be for breaches of the consumer and economic standards, or where</p>	<p>The Council is in the process of completing a self-assessment against the new Consumer Standards in order to assess our compliance and take steps to meet any Standards which are not yet compliant.</p> <p>Systems are being put in place to record any actions arising from Regulator and Ombudsman requests.</p> <p>A gap analysis will be undertaken of where we are now against the Standards. The council will need to ensure documents are reviewed and published via the website.</p> <p>The council took the decision to make a self-referral to the Regulator of Social Housing in December 2023. This was</p>

	<p>providers have failed to comply with transparency requirements. Tenants can request copies of PIPs and if there is a failure to comply, compensation may be payable to those who have suffered.</p>	<p>done in the interests of openness and transparency following a review of our performance data on repairs, decent homes and the timely delivery of fire safety actions. We have provided details of our actions to improve performance and have communicated with tenants, residents and key stakeholders on the matter. We await the decision of the Regulator in terms of whether a notice will be served on the council and how the Regulator will work with us to drive improvement.</p>
<p><b>New Decent Homes Standard</b></p>	<p>The new Decent Homes Standard has not yet been published.</p> <p>Meeting the Decent Homes Standard is specifically referenced as part of the revised Consumer Standards and is therefore required in order to be compliant.</p> <p>To date, no additional funding has been identified to help providers deliver the uplifted standard.</p>	<p>The council will ensure to keep informed about the forthcoming consultation and what the proposed higher standards will require.</p> <p>The council plans to commission a new stock condition survey in early 2024 which will provide a clearer idea of the condition of the stock. The results from the survey will enable an assessment to be made against the updated Decent Homes standard.</p>
<p><b>New Tenant Satisfaction Measures</b></p>	<p>Tenants Satisfaction measures must be published every summer to tenants and submitted to the RSH. There is significant reputational risk if the outcome is particularly unfavourable and compares poorly to comparable boroughs.</p>	<p>Pinnacle and Lewisham Council have already begun undertaking these surveys.</p> <p>The TMOs surveys will be taking place in early 2024.</p> <p>Work is in progress to ensure the council can report our TSMs by the deadline of 28<sup>th</sup> June 2024.</p>
<p><b>New professional qualification requirements</b></p>	<p>The requirements will need sufficient time resource to be made by relevant managers and directors, which may impact their existing workload and work life balance.</p>	<p>The roles have been identified in the Council that fall within the criteria requiring housing qualifications.</p> <p>Moving forwards:</p>

	<p>Existing employees falling within scope who don't have the relevant qualifications will no longer meet the requirements of their role. A lack of qualifications or unwillingness to work towards one would lead to a capability process which could ultimately result in dismissal.</p> <p>Employers will need to put in place appropriate measures to support existing employees to obtain the relevant qualification.</p>	<p>The following, the following actions will take place:</p> <ul style="list-style-type: none"> <li>• <b>January 2024</b> - staff engagement and briefing sessions. This will include requesting that staff with qualifications provide proof/evidence for validation and recording on personnel files.</li> <li>• <b>By End of February</b> – Deadline with proof of existing relevant qualifications provided and record established.</li> <li>• <b>Early March</b> – write to those staff who do <i>not</i> hold existing relevant qualifications to set out next steps and how Council will support them in obtaining qualification</li> <li>• <b>Late March</b> – commence 1-2-1 with staff to discuss timeframes</li> <li>• <b>TBC</b> - Enrolment and course commencement to begin. (Course duration to be confirmed)</li> </ul>
<p><b>Enhanced powers for the Housing Ombudsman</b></p>	<p>There has already been an increase in cases coming through the Housing Ombudsman over the past year. These cases take considerable time for officers outside of the complaints team to respond to, compiling the evidence and information requested by the Ombudsman.</p> <p>The council will need to be aware of the potential of receiving more complaints as the threshold for the RSH to intervene in consumer issues is reached more quickly. A four-fold increase in average cases is expected nationally.</p>	<p>The two complaints functions from former Lewisham Homes and the former Housing Division have been combined following the transfer of Lewisham Homes to the council in October 2023. The new function sits within the Resident Engagement and Services division of the Housing Directorate, reporting directly to the Director.</p> <p>A complaints action plan has been drafted and includes actions to refresh the existing self-assessment against the Ombudsman's complaints handling code, carry out complaints management training, agree a compensation policy and refresh the complaints performance dashboard.</p> <p>A process is being developed to track the implementation of any orders and recommended actions.</p>